

# I-CO GLOBAL COMMUNICATIONS LIMITED

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

20 June 1995

William F. Caton  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554 USA

DOCKET FILE COPY ORIGINAL

Re: Reply Comments in 2 GHz Band Allocation Proceeding (ET Docket No. 95-18)

Dear Mr. Caton:

## *Introduction*

I am submitting this letter as Chief Executive Officer of, and on behalf of, I-CO Global Communications Limited, an English company that will be known to many participants in this proceeding as the "affiliate" created by the International Mobile Satellite Organization (Inmarsat) to establish a satellite system in intermediate circular orbit to provide global personal communications services, then referred to as Inmarsat-P services.

On 21 February, I sent a letter to Scott Harris, Chief of your International Bureau, to notify the Commission of I-CO's plans to use the 2 GHz bands for its service links and our desire to provide such services in the United States market. In his reply dated 23 May, Mr. Harris confirmed that he had caused my letter to be incorporated in the record of this proceeding. Please treat this new letter as a reply comment and also include it in the record. We are making arrangements to have copies served on all parties of record.

## *Background*

Before I state our views about some of the issues in this proceeding, I want to provide the following relevant background information

First, when the United States Party supported the creation of the affiliate at the Inmarsat Assembly last December, Ambassador Vonya McCann, U.S. Coordinator and Deputy Assistant Secretary, Bureau of Economic and Business Affairs, Department of State, stated for the record that "the United States welcomes the competition that will be offered by Inmarsat P services and will work to assure that these services can be provided under fair and open competitive conditions to persons in the U.S." I assume that the record of that Assembly meeting is available in the Commission.

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Second, as I indicated in my earlier letter to Mr. Harris: "Selection of the 2 GHz bands for the [Inmarsat-P] MSS service links was, in part, based on discussions with Ambassador Jan Baran, Chairman of the US delegation, and with other US government officials during the WARC-92 in Torremelinos, Spain. It was suggested that, in view of the heavy demand for the 1.6/2.4 GHz for the US big LEO systems, Inmarsat should consider using the 2 GHz bands for its future handheld satellite system."

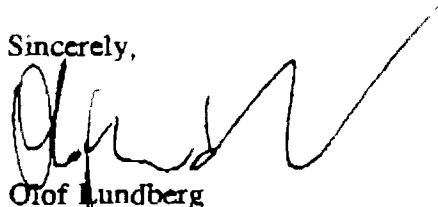
*Views About the Issues*

I-CO is aware that COMSAT Mobile Communications has proposed an alternative plan for band sharing that would mitigate the need for relocation of terrestrial services as well as avoiding any mutual incompatibility among satellite systems that might otherwise lead to auctions of the spectrum. While I-CO has not yet independently analyzed the possible impact of that alternative plan on the I-CO system, we encourage the Commission to explore such an alternative. If there is a technical forum in which interested parties have been invited to join in this effort, we would like to participate.

The big LEO systems that have already been licensed by the Commission to use 1.6/2.4 GHz as their primary spectrum for these services received that spectrum without any relocation cost reimbursement obligation and without any auction. In the interest of competitive fairness, any new entrants into the US market who require use of 2 GHz as their primary spectrum for the same kinds of services should receive it on terms and conditions similar to those applicable to the original licensees. If massive new spectrum costs were imposed on such new entrants, it would be impossible for them to compete.

Thank you very much for facilitating consideration of these views in this proceeding.

Sincerely,



Olof Lundberg  
Chief Executive Officer

Copies:        Scott Harris (by hand)  
                  All Commissioners (by hand)  
                  All parties of record (by mail)  
                  Attached Service List

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